

EXHIBIT 1

Melanie M. Blunschi
 Direct Dial: 415.395.8129
 melanie.blunschi@lw.com

505 Montgomery Street, Suite 2000
 San Francisco, California 94111-6538
 Tel: +1.415.391.0600 Fax: +1.415.395.8095
 www.lw.com

LATHAM & WATKINS LLP

September 16, 2017

VIA E-MAIL

Charles K. Verhoeven
 Quinn Emanuel Urquhart & Sullivan, LLP
 50 California Street, 22nd Floor
 San Francisco, California 94111-4788
 charlesverhoeven@quinnmanuel.com

FIRM / AFFILIATE OFFICES

Barcelona	Moscow
Beijing	Munich
Boston	New York
Brussels	Orange County
Century City	Paris
Chicago	Riyadh
Dubai	Rome
Düsseldorf	San Diego
Frankfurt	San Francisco
Hamburg	Seoul
Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

Re: Waymo LLC v. Uber Technologies, Inc., et al., Case No. 3:17-cv-00939-WHA (N.D. Cal)
– Third Party Stroz Friedberg, LLC’s Production of Documents

Dear Mr. Verhoeven:

Stroz Friedberg LLC’s (“Stroz”) is producing via a secure link documents responsive to Waymo LLC’s (“Waymo”) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises, dated May 10, 2017 (the “Waymo Subpoena”). These documents are marked with Bates numbers ranging from STROZ_0000001 to STROZ_0018088 and have been marked “Confidential” in accordance with the protective order in the above-captioned action.

To locate responsive documents, Stroz collected Outlook email, Outlook calendar entries, and other electronic documents that were sent, received, or created between February 1, 2016, and February 23, 2017, from 53 Stroz employees or former employees. These custodians are listed in **Attachment A**. Stroz then applied search terms to this document population in order to locate documents responsive to the Waymo Subpoena. These search terms are listed in **Attachment B**. Counsel for Stroz reviewed the resulting documents to determine whether they were responsive to any of the requests in the Waymo Subpoena.

The production is made subject to and without waiving Stroz’s Responses and Objections to the Waymo Subpoena. Furthermore, the disclosure of any documents or communications subject to attorney-client privilege, the attorney work product doctrine, or any other potentially applicable privilege is inadvertent, and any such inadvertent production is not intended as a waiver of these protections or any other applicable protections.

Pursuant to the Court’s Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before Judge William Alsup, Stroz is concurrently providing a privilege log detailing the documents that it has withheld or redacted based on privileges held by Stroz. As explained during the September 14, 2017, discovery hearing before Magistrate Judge

LATHAM & WATKINS^{LLP}

Corley, Uber Technologies, Inc. (“Uber”) will be providing an additional privilege log detailing the documents that are being withheld or redacted based on privileges asserted by Uber, Ottomotto LLC, and/or Otto Trucking LLC.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Melanie M. Blunschi
of LATHAM & WATKINS LLP

cc: Counsel for Parties

LATHAM & WATKINS LLP

ATTACHMENT A
List of Custodians Whose Documents Were Searched

- | | | | |
|-----|-----------------------|-----|------------|
| 1. | [REDACTED] | 28. | [REDACTED] |
| 2. | Accounting Department | 29. | [REDACTED] |
| 3. | [REDACTED] | 30. | [REDACTED] |
| 4. | [REDACTED] | 31. | [REDACTED] |
| 5. | [REDACTED] | 32. | [REDACTED] |
| 6. | [REDACTED] | 33. | [REDACTED] |
| 7. | [REDACTED] | 34. | [REDACTED] |
| 8. | [REDACTED] | 35. | [REDACTED] |
| 9. | [REDACTED] | 36. | [REDACTED] |
| 10. | [REDACTED] | 37. | [REDACTED] |
| 11. | [REDACTED] | 38. | [REDACTED] |
| 12. | [REDACTED] | 39. | [REDACTED] |
| 13. | [REDACTED] | 40. | [REDACTED] |
| 14. | [REDACTED] | 41. | [REDACTED] |
| 15. | [REDACTED] | 42. | [REDACTED] |
| 16. | [REDACTED] | 43. | [REDACTED] |
| 17. | [REDACTED] | 44. | [REDACTED] |
| 18. | [REDACTED] | 45. | [REDACTED] |
| 19. | [REDACTED] | 46. | [REDACTED] |
| 20. | [REDACTED] | 47. | [REDACTED] |
| 21. | [REDACTED] | 48. | [REDACTED] |
| 22. | [REDACTED] | 49. | [REDACTED] |
| 23. | [REDACTED] | 50. | [REDACTED] |
| 24. | [REDACTED] | 51. | [REDACTED] |
| 25. | [REDACTED] | 52. | [REDACTED] |
| 26. | [REDACTED] | 53. | [REDACTED] |
| 27. | [REDACTED] | | |

LATHAM & WATKINS LLP

ATTACHMENT B
List of Search Terms Applied

- “Amdursky” OR
- “Apparate International” OR
- “Burnette” OR
- “Chauffeur” OR
- “Dogwood Leasing” OR
- “(Donahue W/2 Fitzgerald)” OR
- “Dorney” OR
- “Driverless” OR
- “Fenwick” OR
- “Ferrari” OR
- “Gardner” OR
- “GCA Law Partners” OR
- “Juelsgaard” OR
- “Levandowski” OR
- “Levine Baker” OR
- “Lidar” OR
- “Lior Ron” OR
- “Mandell” OR
- “Melveny” OR “O’Melveny” OR “OMM” OR
- “MoFo” OR “Morrison” OR
- “Ognen” OR
- “Otto” OR “Ottomotto” OR
- “Pouch Holdings” OR
- “Sebern” OR
- “Self Driving” OR
- “Sieben” OR
- “Stojanovski” OR
- “Tate” OR
- “Tyto” OR
- “Uber” OR
- “Unicorn” OR
- “Waymo” OR
- “Zing”